

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

October 4, 2018

The Honorable Sarah Netburn, U.S. Magistrate Judge  
United States District Court for the S.D.N.Y.  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees and counsel for the Charity Official Defendants<sup>1</sup> write this joint letter in accordance with the Court's direction in the Court's Opinion and Order dated July 6, 2018 (ECF No. 4043; *see also* ECF No. 4129, extending the deadline for filing the letter), directing the parties to "file a joint status letter indicating whether they have agreed upon the attorneys' fees and costs that should be imposed. If the parties have not reached agreement, the status letter should propose a reasonable schedule for briefing on the amount of the attorneys' fees and costs."

The parties have met and conferred, and although the parties have not reached agreement, they have identified specific areas of dispute and have expressed the intent to continue to negotiate toward agreement or to narrow the issues. In light of that intention and rather than deferring the application, the parties are jointly proposing an extended briefing schedule that will afford the parties the opportunity and time necessary to further advance and refine their dialogue.

Accordingly, the parties propose that the Court direct the following briefing schedule:

- The PECs may file a fee application by Monday, November 12, 2018;

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<sup>1</sup> For the purpose of this letter, the term Charity Official Defendants includes defendant Soliman al-Buthe, represented by Bernabei & Kabat, PLLC, and defendants Abdullah Bin Saleh Al-Obaid, Abdullah Muhsen Al-Turki, Adnan Basha, and Abdullah Omar Naseef, each represented by Bernabei & Kabat, PLLC and Lewis Baach Kaufmann Middlemiss PLLC.

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- The Charity Official Defendants may file an opposition to the fee application by Friday, December 7, 2018; and
- The PECs may file a response to the Charity Official Defendant's opposition by Wednesday, December 19, 2018.

Respectfully submitted,

MOTLEY RICE LLC

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*For Defendants Abdullah Bin Saleh Al-Obaide, Abdullah Muhsen Al-Turki, Adnan Basha, and Abdullah Omar Naseef*

cc: The Honorable George B. Daniels, via ECF  
All Counsel of Record via ECF